## IN THE UNITED STATES DISTRICT COURT DISTRICT OF COLUMBIA

JOSEPH MICHAEL ARPAIO

Plaintiff,

V.

MICHELLE COTTLE, et al

Defendants.

Case No.: 1:18-cv-02387-APM

## MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS' MOTIONS TO DISMISS

Plaintiff Joseph Arpaio ("Plaintiff") hereby moves this Court for 21-day extension of time, until and including February 8, 2019 to file responses to Defendants' Motion to Dismiss (ECF No. 8) and Motion to Dismiss Pursuant to D.C. Anti-Slapp (ECF No. 9).

This is Plaintiff's first requested extension after Defendants were granted an additional 30 days to file their initial responsive pleading. The reason for this request is that counsel for Plaintiff, Larry Klayman, has an extremely heavy litigation schedule during this time period, and has been travelling across the country attending to various client matters. As this matter is still in the motion to dismiss stage, this requested extension will prejudice neither party nor the Court.

Plaintiff has asked Defendants for consent and Defendants have consented to the relief sought on the condition that they have an additional two weeks to file a reply, which Plaintiff agrees to.

WHEREFORE, Plaintiff respectfully requests that this Court grant Plaintiff's Motion for Extension of Time.

DATED: January 17, 2019

Respectfully submitted,

/s/ Larry Klayman

Larry Klayman, Esq. Chairman and General Counsel FREEDOM WATCH, INC. 2020 Pennsylvania Ave NW Suite 345 Washington, DC, 20006

Email: leklayman@gmail.com

Tel: 310-595-0800 Counsel for Plaintiff

## **CERTIFICATE OF SERVICE**

I, Larry Klayman, counsel for Plaintiffs hereby certify that on this day, January 17 2019, a copy of the foregoing was filed via this Court's ECF system and served upon all parties and/or counsel of record.

<u>/s/ Larry Klayman</u> Larry Klayman

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JOSEPH MICHAEL ARPAIO	
Plaintiff, v.	
MICHELLE COTTLE, et al	Case No.: 1:18-cv-02387-APM
Defendants.	
[PROPOSED] ORDER	
Upon consideration of Plaintiff's Motion for Extension of Time, and for	
good cause shown, it is hereby ORDERED that Plaintiff's motion is granted.	
Plaintiff's responses to Defendants' Motion to Dismiss and Motion to Dismiss	
Pursuant to D.C. Anti-Slapp Statute are due on FEBRUARY 8, 2019	
Date:	
	Hon. Amit P. Mehta